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14 SHERIFF VICKI HENNESSY

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16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA

18 RIANA BUFFIN and CRYSTAL
19 PATTERSON, et al.,

20 Plaintiffs,

21 vs.

22 SHERIFF VICKI HENNESSY, in her
23 official capacity,

24 Defendant.

25 vs.

26 CALIFORNIA BAIL AGENTS
27 ASSOCIATION,

28 Intervenor Defendant.

Case No. C15-04959 YGR

**DECLARATION OF SERGEANT LINDA BUI IN
SUPPORT OF THE SHERIFF'S RESPONSE TO
THE MOTIONS FOR SUMMARY JUDGMENT**

Hearing Date: December 12, 2017
Time: 2:00 p.m.
Place: Courtroom 1, Fourth Floor
Judge: Hon. Yvonne Gonzalez Rogers

1 I, Sergeant Linda Bui, declare as follows:

2 1. I am employed by the San Francisco Sheriff's Department and work in its information
3 technology division. I am the administrative Sergeant. I help to oversee daily operations, act as a
4 liaison with other criminal justice agencies in the city, review public records request for data and assist
5 the business analyst with data requests.

6 2. I am familiar with the Jail Management System used by the Sheriff's Department.

7 3. I prepared the spreadsheets labeled SHF000235 and SHF000236 in response to
8 discovery requests served by Plaintiffs in this lawsuit. I prepared them by extracting data from the Jail
9 Management System.

10 4. The number of jail days reported on SHF000236 represents the number of jail days
11 credited (for example, if the court were to impose a custodial sentence). Any fraction of a 24-hour
12 calendar day is credited as a full calendar day, so a period of less than 24 hours will be credited as at
13 least one day and could potentially be credited as two days. As a result, the number of jail days
14 credited overstates the actual amount of time in custody.

15 5. In their discovery requests, Plaintiffs requested the duration of custody by certain
16 ranges of hours, and those data are reported in SHF000235.

17 6. The Jail Management System does not distinguish between releases that occur before
18 arraignment and those that occur at arraignment or some later time. A release designated "Assertive
19 Case Management" may have occurred before arraignment, at arraignment, or at some later point.

20 7. The Jail Management System is able to record only one release reason. However, it is
21 not unusual for a person to be in jail for more than one reason, and the release reason typically reflects
22 the last matter for which the person is in jail. That means there will be cases in which release was
23 granted through the OR Project, but in which the "release reason" does not appear as either "Project
24 O.R." or "Assertive Case Management" in SHF000235 and SHF00236.

25 I declare under penalty of perjury under the laws of the State of California and the United
26 States that the foregoing is true and correct. Executed this 14th day of November 2017 in San
27 Francisco, California.

28 _____

/s/Linda Bui

Sgt. Linda Bui